

## Appendix E- Comments and Responses- Lakewood Southeast Project

### Commenter ID

|                        |                       |                         |
|------------------------|-----------------------|-------------------------|
| 1. Mike Kelnhofer      | 25. Mark poradek      | 49. Judith Savard       |
| 2. Jerry Knuth         | 26. DNR               | 50. Debra Brandt        |
| 3. Robert Lepkowski    | 27. ELPC              | 51. KC                  |
| 4. Kurt Schmidt        | 28. Jane Severt       | 52. Patricia Shifferd   |
| 5. Michael Schug       | 29. Ronald Richards   | 53. Gerald Lott         |
| 6. Phil Valitchka      | 30. Neil Paulson      | 54. Wesley Powers       |
| 7. Patty Bauman        | 31. Patricia Nadreau  | 55. John/Martha         |
| 8. Michael Joyce       | 32. Barbra Helser     | Stoltenberg             |
| 9. Paul Mongin         | 33. Thomas Hogan      | 56. Stephen Pieckermann |
| 10. Jim Wisneski       | 34. Joannie Voeks     | 57. Anon Anon           |
| 11. Connor Van Doren   | 35. Thomas Duffy      | 58. Betty Van Leuven    |
| 12. Uhlenbrauk         | 36. Susan Michette    | 59. Le Hunt             |
| 13. Ronald Mayer       | 37. Claire Rintelmann | 60. Jan Saecker         |
| 14. Sherry Pether      | 38. Allen Sheldon     | 61. Kristen Zehner      |
| 15. Kurt Butler        | 39. Bill Wall         | 62. Mary Plummer        |
| 16. Robert Smith       | 40. Barbra Drake      | 63. Robert Verrette     |
| 17. David Bartz        | 41. Kathy Trochlell   | 64. Carol Enseki        |
| 18. Roger Kugel        | 42. Brian Pierce      | 65. Nancy Moore         |
| 19. Joe Liebman        | 43. Lori Hein         | 66. Mark M Giese        |
| 20. Bachman            | 44. Jeannie Voeks     | 67. MaryJo Malo         |
| 21. Reginald Robinette | 45. Daniel Barth      | 68. Carol Howard        |
| 22. Dick Artley        | 46. Judy Olson        | 69. Matthew De Mars     |
| 23. Tom Jacobs         | 47. Janice Burgi      | 70. Mary Smith-Johnson  |
| 24. Gary Zimmer        | 48. Jennifer DeNetz   |                         |

### A. Comments that came in outside the comment period

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| 2  |                  | What happens when you “decommission” a roadway? I noticed that there would be 3.9 miles of road closed. Was any of this 3.9 miles reviewed in the recent or past “Request for MVUM Review”? | Decommissioning is to render a road inaccessible to all motorized traffic. The MVUM review team works closely with the districts to incorporate any information or changes. The 3.9 miles of road that was designated for closure during the Lakewood Southeast project are roads that are needed for long-term management but need to be |
| 8  | 2                | <i>I am not at all happy with all the roads you have closed to motor vehicles and 4 wheelers for handicapped people. Open during hunting season.</i>  |   |
| 29 | 4                | Do not closure any more roads.  |   |
| 13 | 1                | <i>Locked gates cause access problems for fire control.</i>   |   |

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| 17                               | 3                                       | Support road closures.  | closed for resource protection.  |
| 26                               | 12                                      | <i>Support low road density.</i>  | This FEIS works toward reducing road density.  |
| 8<br>29                          | 1<br>1                                  | I like to see plans to log and thin trees to improve the habitat for wildlife and to use a renewable resource.  | Thank you for your comment   |
| 10                               | 1                                       | How does this effect ATV routes?  | There should be no affect to ATV routes because specific design features were developed to reduce the likelihood of conflict between users and logging activities. Hauling will be restricted during higher use periods, primarily weekends (Friday noon to midnight Sunday). Logging debris will be removed from the edge of the route and sight distance requirements will be maintained through decking logs on the outside of corners. |
| 11                               | 1                                       | Comments on roads outside of LSE  | This is outside the scope of the project.  |
| 12                               | 1                                       | Will you burn during snowmobile season?   | The only possible conflict for snowmobile trails with burning would be on the units that specify top wood to be skidded to the landing. If the piles of top wood are not removed as biomass chips they would then be burned, most likely in the winter. If we burned, the piles in the winter there should be minimal, if any effect on the trail use. We would not burn on weekends.  |
| 14<br>17<br>28<br>24<br>26<br>26 | 1<br>1<br>1<br>5, 6<br>10<br>1, 3, 5, 9 | Support project<br><br><i>Support restoring pine barrens (should increase acres) and maintaining openings.</i><br>Support aspen age class goals, conversion to long live species along streams, reduction of stocking in pine stands, and oak management. | Thank you for your comment.  |
| 14                               | 2                                       | "The amount of aspen converted to pine under either   | See the FEIS, 3.3.2 and 3.6.2  |

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|    |           | alternative is a good thing, and should not be of concern to ruffed grouse hunters... There are so many poplar stands (of varying ages, but particularly young ones) around here... And that's not to mention all the R.G. management areas. We need more diversity in our forest. Besides, grouse populations here on beginning the downhill slide in their cycle here..." | on aspen. See Chapter 1, Needs, for aspen composition and age classes in the area and on the forest currently.  |
| 17 | 2         | Increase aspen clear-cut regeneration for habitat. Wildlife depending on young forest is in decline.  | Alternative 3 was created to respond to concerns about aspen. This issue is addressed in Section 3.6.2 of the FEIS.   |
| 18 | 1         | What is the status of FR 2867?  | This is outside the scope. Road is closed for resource protection.  |
| 20 | 1, 2      | What is the purpose of the constructed road along Waupee Creek? It follows closer than your set parameters in your plan for the 2.5 miles of proposed road construction. He is concerned about the creek.   | The road would provide timber access. The RMZ at the closest point to the proposed road is 100'. During layout, we will try to avoid locating the roadway inside the RMZ; this may not be possible with the rock outcrop located to the south of the proposed location. The forest plan guideline (p. 2-38) states "Avoid stream and wetland crossings, riparian areas, and frost pockets (whenever possible) when constructing or relocating roads." |
| 20 | 3         | Are there plans for a bridge across Waupee to connect with the road off County W from the north?  | There are no plans to build a bridge across the Waupee Creek at this time.  |
| 20 | 4         | I would have a concern about the 80 acres that are on the southeast corner of Bachmann Road and Riverview Rd.   | Harvests would be a thin and shelterwood harvests.  |
| 20 | 6a        | Project Area 69-35 and 76-13 and 74-30, how much is going to be clear cut?  | The treatment types and acreages are listed in the treatment tables in Appendix A of the FEIS.  |
| 20 | 6b        | Clear cuts will benefit wildlife and especially grouse, but I would like to have some trees for turkey roosting.  | The CNNF agrees that aspen management will provide valuable early successional habitat that will benefit grouse and many other wildlife species. Wild turkey roosting habitat is typically  |

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|    |           |   | described as a continuous stand of timber that is ideally comprised of mature, open-crowned trees with large parallel branches that is located within one-half mile of a food source. Currently roosting habitat within the project area is mature oak, white, and red pine stands and to a lesser degree the scattered beech and cherry trees. Implementation of this project will harvest some of these species but each action alternative will leave roosting habitat scattered across the project area.                       |
| 22 | 1         | Drop the 2.5 miles of road construction or amend your plan. Develop an alternative without logging or road construction.  | Alternative 4 was created to address your concerns.  |
| 22 | 2         | I have never seen this magnitude of logging.  | This project is within the scope and scale of other past and present vegetation management projects. See <a href="http://www.fs.usda.gov/projects/cnnf/landmanagement/projects">http://www.fs.usda.gov/projects/cnnf/landmanagement/projects</a>   |
| 22 | 3         | “Log landings and skid trails provide a source for sediment that might enter streams when it rains...Timber harvest collapses some of the subsurface pipes, increasing local pore water pressure and the chance of landslides.” [Sidle, 1986] | See FEIS, Section 3.8.2. If construction of a landing or back in spur is required and mineral soil is exposed, then potential for soil erosion remains very low because level, well-drained upland areas are generally designated and natural ground cover would be re-established within one or two growing seasons. The Sidle Study is not applicable to the CNNF climate, terrain, vegetation, soils, or harvest methods. CNNF soils do not have subsurface pipes or pipe-flow and the terrain is not susceptible to landslide. |
| 22 | 4         | “Some scientists’ research shows that timber harvest causes resource damage to occur... Timber harvest  | Concerns about nutrient depletion have been addressed  |

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|           |                  | removes dead and dying trees. When left on-site these trees decompose and create organic material in the soil. How will this organic material be replaced?"   | in the Soil Resources Section 3.8.2 of the FEIS and accompanying analysis.   |
| 22        | 5                | "Areas with the timber harvested are more susceptible to the outbreak of pests and regulate insect activity in surrounding homogenized forests." [Schowalter and Means, 1989; Franklin, Perry, Schowalter, Harmon, McKee and Spies, 1989]. "Will this be true in this project area?"  | No. The District averages about 3,500 acres of timber harvests annually. Over the past 20 years, we have not had any notable problems with pest outbreaks in our harvest areas. The documents you've cited are well known and pertain to western forests where bark beetle outbreaks are much more of a concern.   |
| 22        | 6                | "Congress has found that tourists and forest visitors avoid areas where timber harvest has occurred. Statistics show that the economic stability of small communities near the forest is harmed. Congressional testimony shows that tourist dollars far exceed the revenue created by timber harvest activities. Will this be the case here?" | The CNNF monitoring shows that the highest recreational use is hunting (24% of the visits main activity was hunting). The top species hunted are dependent on openings and edges, which is complementary to our actions. Recreation and timber are both beneficial income for the local economy. The FS is required by the Multiple Use Sustained Yield Act to provide for both. |
| 22        | 7, 8             | Logging: "Adversely affects hydrologic processes by reducing canopy interception and evapotranspiration".   | See FEIS, Section 3.9.2, peak flow.  |
| 22        | 7                | Logging: "Decreases the hydraulic conductivity and increases bulk density in forest soils after harvest".   | See FEIS, Section 3.8.2, soil compaction and rutting   |
| 22        | 8                | Logging: "Increases water temperature by altering available sunlight, conductivity by changing the amount of organic matter that collects in vernal ponds or pH if the logging process deposits foreign residues to the area. It also damages aquatic habitats through siltation and reduction in stream complexity."                         | See comment and answer #27-14.   |
| 22        | 9                | Logging: "Removes mature and maturing trees which conserve essential elements, whereas the area containing new very young planted trees following logging are susceptible to erosion and essential element loss."   | See FEIS, Section 3.8.2, erosion, and displacement, and soil productivity. The removal of nutrients in merchantable tree boles or whole trees (bole plus crown) from one treatment area would not affect total site nutrients on adjacent areas.   |

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| 22             | 10a            | Logging: “Removes tree parts that would have created and maintained diversity in forest communities”.  | The forest plan (Chapter 2) includes standards and guidelines to maintain biodiversity.  |
| 22             | 10b            | Logging “Removal of dead and dying trees eliminates habitat required by bird species that feed on insects that attack living trees, with the result that outbreaks of pests may increase in size or frequency”. [Torgersen et al. 1990]      | To address this, the forest plan (Chapter 2) includes standards and guidelines to maintain biodiversity.   |
| 23             | 1              | Do not cut 65 year-old red pine.   | This was a stand specific concern and was addressed by substituting the stand of concern with another stand.   |
| 23<br>24<br>28 | 2<br>2, 3<br>2 | Cut old falling down aspen.<br><i>Convert less aspen, because even with the clearcuts, where would be less aspen total. Aspen is declining as a species.</i><br>Aspen is declining, so we are concerned about the aspen conversion in MA 4B. | Alternative 3 was created to respond to concerns about over mature and declining aspen.  |
| 23             | 3              | Burning makes brush grow back thicker.   | It may. However, this depends on the burn prescription, timing of the burn, fuel types, and weather conditions.  |
| 24             | 4              | “Recreational benefits of early successional wildlife species for consumptive and non-consumptive purposes need to be considered during the project evaluation.”   | We considered recreation in early successional habitat in creating Alternative 3.  |
| 26             | 2              | The conversion of nearly 1,800 acres of aspen type in MA4B, while aligned with the forest plan direction, will have negative impact on early successional wildlife species such as American woodcock and golden-winged warbler.              | The loss of early successional habitat and its impacts are discussed in Section 3.6.2 of the FEIS.   |
| 26             | 6, 8           | On increasing the pine component, species of conservation need deciduous trees and shrubs. Hold white pine stands longer for a number of birds.  | In proposed regeneration harvest red and white pine stands, a shrub layer of scrub oak and red maple is very abundant. Typically, when pine plantations are established in this part of the district, management includes at least one release cut to prevent this shrub layer from overtopping the planted seedlings. In many situations, there needs to be a second release cut before the seedlings are free to grow. |

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|    |           |  | Following the release(s), the shrub layer normally sprouts again. Without the use of chemicals or prescribed fire, it would be very difficult to keep the shrub layer down. This resilient shrub layer in those pine stands will provide needed habitat for many wildlife species.  |
| 26 | 7         | Younger red pines have ladder fuel and have high hazard potential. Work with the DNR and local land owners on fire.  | We have worked together in the past to protect communities from fire. We are currently working with the WDNR on this project and have spent time with them on site in the analysis area discussing areas of concern and we will continue to work with them on this project. The CNNF has also sent the landowners in the Airport lane area with a letter on 2011. The CNNF plans to continue working with the landowners in the future. |
| 26 | 13        | Consider high stem densities adjacent to barrens.  | The CNNF will attempt to incorporate this into the design of all action alternatives when dealing with management of wildlife openings, American woodcock, and golden-winged warbler.   |
| 27 | 3a        | “That assessment should include, at a minimum, a complete accounting of how many acres of aspen, oak, pine, and forest generally, have been logged each year over the past 15 years...consider early-successional forests on nearby State-and privately-owned forests within the region. These forests, many of which are actively managed, could already be providing the very habitat this project is intended to create... the Forest Service must take a “hard look” at all of the impacts of the proposed logging and road building activities. <i>Methow Valley Citizens Council</i> , 490 U.S. at 350. The Forest Service <u>must consider</u> not only the direct and indirect effects of these proposed timber sales, 40 C.F.R. | See Chapter 3 and the various specialists’ reports. The IDT compiled cumulative actions for CNNF and non-federal lands. This information was used to analyze cumulative effects in the FEIS, Chapter 3. Cumulative effects included federal and non-federal actions for each alternative. Private land analysis was completed in the BE, Section 6.0. Impacts from the  |

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|    |           | <p>§ 1508.8(b), but also the cumulative impacts of the proposed timber sales in combination with all “past, present, and reasonably foreseeable future” actions on both public and private lands...A cumulative impacts analysis for the Lakewood Southeast project must consider the impacts of all past, present and reasonably foreseeable impacts of timber sales, road building, and related actions from throughout the National Forest, not just from a geographically limited project area. The need for a Forest-wise assessment is especially warranted for this project, which spans across multiple ranger districts on both the Chequamegon and Nicolet sides of the CNNF. As part of the cumulative impacts analysis, the Forest Service should keep in mind the number, volume, and location of timber sales that are being proposed for the Forest. Since the 2003 approval of more than 40,000 acres of... timber sales. All of this activity, along with other past, present, and reasonably foreseeable actions, must be fully and fairly considered as “relevant factors” in the Forest Service’s cumulative impacts analysis for the Lakewood Southeast project. Before limiting the geographic scope of its cumulative impacts analysis in any way, the Forest Service must look at each of these proposed actions and must expressly state whether (and why) each action is cumulatively related to the Lakewood Southeast project and, therefore, whether that action should be included in a full cumulative impacts analysis.</p> <p>Significantly, the Lakewood Southeast project would add nearly 12,000 acres of new logging to the CNNF, where, as noted above, multiple major timber projects are already occurring or are proposed to occur in the near future. ... Logging, road building, and development occurring on public and private lands within and adjacent to the CNNF must also be factored into this cumulative impacts analysis”</p> | <p>proposed road management activities were completed for relevant TES and RFSS in the BE Section 6.0.</p> <p>Documentation and rationale for impact boundaries and scale of effects analysis used can be found in the BE.</p> <p>In the red-shouldered hawk and northern goshawk discussions, a reduction in the long-term effects to these species habitats was made from the proposed treatments. The initial harvest treatments would have made these hardwood stands unsuitable for approximately 50 years. For goshawks, 606 acres and for red-shouldered hawks 1,035 acres of upland hardwood were limited to shelterwood prep cuts that would be similar to a commercial thin cut (FEIS Sections 3.4 and 3.6 and BE, Section 6.1.2.3). While these treatments would likely result in fewer acres of young oak stands over the next fifteen years, they would still move the stands toward long-term desired conditions while ensuring nesting habitat is maintained in the project area.</p> |
| 27 | 3b        | <p>“... Private lands within and adjacent to the Forest are becoming increasingly fragmented due to development and logging... Land development and intensive logging on nearby private lands reduce the amount and value of wildlife habitat in those areas, making habitat in the National Forest all the more important for the continued viability of threatened, endangered and Regional Forester’s Sensitive Species... The impacts of this combined logging on wildlife habitat (particularly for RFSS such as woodland hawks), water resources, recreation, protected areas, and other important forest</p>  | <p>For wildlife concerns, see response to #27-12a and b; also see response #27-18b.</p> <p>For effects, see Chapter 3 in the FEIS.</p>   |



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|    |           | resources must be fully and carefully considered before the Lakewood Southeast project is finally approved.”   |  |
| 27 | 6         | “By harvesting stands of mature interior forest, these timber sale projects are undoubtedly creating large swaths of early successional habitat. Thus, the goals of increasing early successional forest and early successional wildlife habitat on the CNNF may have already been met. Before proceeding with project activities designed to increase early-successional conditions, the Forest Service should fully assess whether those activities are actually needed...we question the purpose and need for these logging and related activities more generally.”   | This was done in the early stages of the project analysis. The DEIS Section 1.2.1 shows the existing and desired condition for the project area and takes into account the conditions (and past harvests) across the rest of the CNNF. Additionally, other present and future actions across the CNNF were considered (FEIS, Section 3.2.3).   |
| 27 | 6, 7      | “Early successional-dependent species are already flourishing on the Forest. This includes those species specifically listed in the Notice as benefiting from the project (e.g., the American woodcock)” [Wis. Wildlife Action Plan]. “Creating additional habitat for these species is not necessary. There is already an abundance of young forest in the western Great Lakes region and a decline in species that rely on mature forest habitats, as the Forest Service has acknowledged...We encourage the Forest Service to ... allow more acres of aspen, red oak, and pine to age, and for aspen to naturally convert to northern hardwoods. The proposed 11,820 acres of timber harvests would eliminate key habitat for northern goshawks and red-shouldered hawks” [Jacobs 2002]. “The Wisconsin Department of Natural Resources (“DNR”) has recognized that old-age aspen provides viable habitat for breeding birds including woodland hawks” [DNR]. “Population viability analyses for both northern goshawk and red-shouldered hawk strongly discouraged further losses of habitat in order to protect the viability of these sensitive species on the National Forest... we are concerned that this project’s goal of increasing early successional forest and wildlife habitat is coming at the expense of species that depend on mature, late-successional forests, such as the red-shouldered hawk and northern goshawk. Given that these species are RFSS as well as management indicator species, management decisions should take special heed of their habitat needs. If the Forest Service continues to pursue its goal of increasing early successional forest and habitat...fully | The “Species of Greatest Conservation Need in Wisconsin” table is inapt for comparing species population statuses in the state. That table shows species “Relative Abundance” rating based on how the size and extent of all populations in Wisconsin compare with total size and extent of all populations across the rest of the species’ range. As a result, in this table a population could have a “high” rating in the state due to its comparison to its low population status throughout the rest of its range (i.e. woodcock and golden-winged warbler). Local management is required for effective conservation of core populations that are important for stabilizing, restoring, and expanding these populations throughout all of their range. Management of early successional habitat is addressed in the FEIS. There is a decline of early successional habitat across the |

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|    |           | analyze the impacts of any timber harvest and regeneration to ensure that it will not threaten the viability of northern goshawks and red-shouldered hawks in the Chequamegon-Nicolet and elsewhere.” | <p>CNNF and Upper Mid-west region and the impacts of the loss of that critical habitat to several species. This included the Golden-winged warbler that is currently being reviewed by the USFWS for inclusion on the Federal list of Threatened and Endangered Species due to their population and habitat declines. Impacts of all proposed harvest treatments to woodland raptors was addressed in the BE, Section 6.1.2.3 - Red-shouldered Hawk and MIS/MIH, Section 3.6 - Goshawks.</p> <p>Jacobs (2002) is an annual report submitted to the CNNF as part of a contractual agreement between the CNNF and Mr. Jacobs. The report describes that year’s red-shouldered hawk production on the NNF. However, the referenced report makes no mention of “change of natural forests to industrial forests of aspen regeneration and pine plantations” as the commenter suggests.</p> <p>The WDNR Silviculture and Forest Aesthetics Handbook is a handbook that provides a variety of tools and resources to assist private and industrial foresters to engage in actively managing their forested lands. Chapter 43 is about “Aspen” marking guidelines and on page 12 addresses “Wildlife Attributes” and mentions that mature aspen stands are suitable habitat for goshawks. The CNNF agrees with that statement that “old-age aspen provides viable habitat for</p> |

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|    |           |   | breeding birds including woodland hawks.” In its Habitat Models for Effects Analysis-Animals RFSS (St. Pierre 2010), the CNNF has described mature aspen as suitable habitat for goshawks. Mature aspen stands are not mentioned as suitable habitat for red-shouldered hawks by the WDNR in this document. Aspen also is not included in St. Pierre’s (2010) report describing suitable habitat for red-shouldered hawks.   |
| 27 | 8         | “Far from being overabundant, large blocks of mature interior hardwood forest are decreasing across the CNNF as a result of logging activities. Rather than focus on eliminating habitat that is ideal for RFSS such as woodland hawks” [NW Howell Final Supplemental EIS, Appendix B], “we recommend that other, less mature stands be considered for timber harvest.” | The CNNF disagrees with the commenter’s assertion that large blocks of mature interior hardwood are decreasing. In 2011, the CNNF had approximately 125,260 acres of mature northern hardwood interior forest, with the majority of these acres occurring in MA 2. Overall, this represents an increase of approximately 4,400 acres from last year (4% increase) and a 35% increase since 2004 (St. Pierre 2012). This increase was anticipated during the forest plan revision process because many of the hardwood stands were on the cusp of turning 80 years old. As a result, the CNNF is on target to reach 140,000 acres of mature northern hardwood interior forest projected in the forest plan within 20 years (forest plan FEIS, p. 3-102). This is due in part to over the past decade the CNNF has had numerous projects in which the Deciding Official opted to select an alternative that preserved or actually enhanced large blocks of |

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|    |           |  | <p>hardwoods (such as the north half of the McCaslin Project). The forest plan greatly restricted the amount of temporary openings (e.g. clearcuts) within large hardwood blocks designated as MA 2B.</p> <p>The majority of the project area is within MA 4A and 4B. The focus of MA 4A is conifer: red-white-jack pine and 4B is for conifer: natural pine oak. Neither MA has the <i>focus</i> of managing for the promotion of mature northern hardwoods interior forests. As a result, that it would be ecologically inappropriate to force a mature hardwoods emphasis on this area.</p> |
| 27 | 9         | <p>“... we are concerned that the proposed action hinders, rather than promotes, several of the projects purposes... the Forest Service notes that there is a severe shortage of red pine in the 101+ year age class within the CNNF, while there is a surplus in the 61-100 year class...The obvious remedy for this problem is to allow red pines in the 61-100 age class to continue maturing and thereby enter the 101+ age class. Instead, the ...project proposes to harvest many of these red pines. And although a selection harvest or thinning of even-aged plantation red pines may be warranted in certain circumstances, many of the older red pine stands in this project ...will be subject to stand-replacing treatments, such as a shelterwood harvest. Such logging activities are contrary to the purpose and need, and should be eliminated from the project...there is a serious shortage of eastern white pine in the 121+ age class, yet the project proposes logging of white pines in the 61-120 age class”[refer to several stands]... “Proposed harvests of mature white pine stands, or mixed stands of mature white pine and other species, should be dropped from this project.”</p> | <p>In response to these concerns, Alternative 4 was developed. It includes no regeneration of pine stands greater than 80 years of age and no harvests of any kind in pine stands greater than 100 years old. See FEIS, Section 2.2.4. Also, see FEIS, Section 3.2.2, age class distribution for red and white pine.</p> <p>Need 2E –Red Pine states, “These 69-77 year-old stands comprise a “spike” in the amount of 61- 100 year old stands”. See response #27-24.</p>  |
| 27 | 10        | <p>“Logging of white and red pine, particularly stand-replacing treatments such as shelterwood cuts or clearcuts, is unwarranted ...pine is already underrepresented in the project area and across the CNNF... It makes little sense to log existing, mature</p>  | <p>The CNNF disagrees with the commenter’s assertion that harvest treatments within our white and red pine stands are unnecessary. Concerns about regenerating older pine stands</p>   |

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|    |           | stands of white and red pine when those species are already significantly underrepresented. This is especially so given that the agency's acknowledgement that there is a need to <i>increase</i> the number of large conifers within the project area so as to improve habitat for RFSS such as the red-shouldered hawk and goshawk... withdraw any proposed shelterwood cuts or clearcuts of white or red pine." | <p>were used in the development of Alternatives 3 and 4. These alternatives reduce or eliminate regeneration harvests in pine stands 80 years or older. However, in all of the action alternatives the vast majority of the harvests taking place in red and white pine stands would be thinnings. These treatments would be completely consistent with identified objective of growing larger pine trees and improving the habitat quality for the raptor species you mentioned. By reducing the density of trees in these stands, the remaining trees would have less competition and more growing space. Thus, growing conditions would be optimized and more rapid diameter growth would result. Also because of the treatments, the representation of red and white pine would not decrease, but, rather, increase. See Section 3.2 of the FEIS.</p> <p>Also, the commenter's assertion is incorrect that the harvest of mature pine is unwarranted due to "the agency's acknowledgement" that there is a need to increase this type of habitat for woodland raptors. The DEIS does state that there is a lack of large conifer (hemlock and white pine) but it is in the context of hardwood stands and not pure white and red pine stands. The CNNF stated that planting white pine or hemlock in the <i>understory</i> of hardwood stands would</p> |

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|    |           |  | <p>increase species diversity and improve long-term wildlife habitat value (DEIS Section 1.2.1). Stands that are exclusively red and/or white pine are not considered suitable nesting habitat for red-shouldered or goshawks and thus harvest in those stands has no effect. However, incorporating it into the management of our hardwood stands for diversity is an important part of high quality nesting habitat for both species.</p>  |
| 27 | 11a       | <p>“– building 2.5 miles of new road and reconstructing 34 miles of road – are inconsistent with the Forest Plan’s direction, density limits, and this project’s objectives. As the Forest Service acknowledges, “[t]he current road mileage exceeds the density of roads in some areas,” and that the “forest plan’s direction is to reduce average open and total road density... Unless and until those Forest Plan directives have been met, and the Plan’s road density limits fully achieved, the Forest Service should not be authorizing roadbuilding activities that will <i>increase</i> the road density in the project area. We note that this project proposes 36.5 miles of road construction activities, while and in areas with 70% or more canopy closure... proposing to decommission less than 30 miles of roads... the Lakewood Southeast project represents a step in the wrong direction when it comes to roads. The Forest Service should reconfigure this project so that it avoids the need for any further road construction or reconstruction – at least until the Forest Plan’s density limits have been satisfied...”</p> | <p>As shown in Table 3.3.2.1, Table 3.3.2.2, and Section 3.3.2 of the FEIS, each action alternative will reduce the total and open road density. The miles of reconstruction are included in the current figures and do not increase either total or open road densities. The proposed construction is the only thing that would increase road densities. This increase is far outnumbered by the miles of decommissioning for each action alternative, over 20 miles of road. Alternative 3 and 4 were created to reduce the amount of construction to address your concerns.</p> |
| 27 | 11b       | <p>“While many impacts from timber sales come from the logging itself, the related road construction activities can also have significant impacts, which must be studied. Road construction, reconstruction and use can have many pervasive and cumulative effects, such as fragmenting habitat, increasing sedimentation in forest streams and other waterways, enhancing the distribution and spread of many already common and often invasive nuisance plants and animals, and</p>  | <p>Roads and their relationship to invasive species are addressed in Section 3.7.2 and sedimentation in Section 3.8.2 of the FEIS. See response for #27-03.</p> <p>No road actions are included in Alternative 1. Under the action alternatives, open road densities would be decreased</p>  |

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|    |           | contributing to declines of many species sensitive to human disturbance” [Saunders et al 2002]. “The Lakewood Southeast project will involve more than 36 miles of road construction and reconstruction. The impacts of such construction and reconstruction, and the continued use of those roads, must be considered. Because of fragmentation effects, such consideration must focus not only on total road density, but also on the spatial arrangement of the roads in the project area.”   | thus reducing the extent to which traffic-related effects on RFSS could occur. The physical effects of decommissioning roads or new road construction were considered inconsequential to the effects analysis for RFSS because the roads in either case (low-level roads or temporary roads) are unlikely to present barriers to movement, measurably decrease/increase habitat availability, or any other impact to these species that occupy the project area.               |
| 27 | 12a       | <p>“The cumulative impacts requirement is especially important...Forest Service’s various timber sales will impact species whose viability is in danger... We ask the Forest Service to fully and fairly consider the direct, indirect, and cumulative environmental impacts to the following threatened, endangered, and sensitive plant and animal species:</p> <p>Eastern Timber Wolf (<i>Canis lupis</i>) Bald Eagle (<i>Haliaeetus leucocephalus</i>) Canada Lynx (<i>Lynx canadensis</i>) American Marten (<i>Martes americana</i>) Northern Goshawk (<i>Accipiter gentilis</i>) Red-shouldered Hawk (<i>Buteo lineatus</i>) Black-backed Woodpecker (<i>Picoides arcticus</i>) Spruce Grouse (<i>Falcapennis Canadensis</i>) West Virginia White Butterfly (<i>Pieris virginienensis</i>) Mingan’s moonwort (<i>Botrychium minganense</i>) Goblin fern (<i>B. mormo</i>) Blunt-lobed grapefern (<i>B. oneidense</i>) American ginseng (<i>Panax quinquefolius</i>).</p> | <p>All threatened, endangered, and RFSS that have habitat and potential for occurrence in the project area were analyzed, see BE and Sections 3.4 and 3.6 of the FEIS. Direct, indirect, and cumulative effects were discussed for those species with habitat, potential for occurrence, and potential impact by proposed projects. Detailed information on red-shouldered hawk is provided in the BE section 6.1.2.3 and for northern goshawk in the FEIS, Section 3.6.2.</p> |
| 27 | 12b       | We stress that the Forest Service must take a particularly close look at the direct, indirect, and cumulative impacts of the Lakewood Southeast project on the northern goshawk and red-shouldered hawk. The project area contains some of the most important habitat for these species on the entire CNNF, not only due to its proximity to the Boulder project area (the subject of a 2007 settlement that focused on goshawk nesting sites and habitat), but also because the project area is at the southern edge of the CNNF. As the Forest Service has previously acknowledged, these areas provide some of the premier red-shouldered hawk habitat on the entire  | <p>The focus of the 2007 Boulder Project Settlement was for red-shouldered hawk habitat, not goshawks as identified by this commenter. For expected impacts to red-shouldered hawks see BE Section 6.1.2.3 and for Northern goshawk see– MIS/MIH Section 3.6 by alternative. See FEIS, Section 3.4.3, Red-</p>   |

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|    |           | <p>Forest...</p> <p>The NFMA regulations expressly adopted by the 2004 Chequamegon-Nicolet National Forest Plan require the Forest Service to ensure that the continued viability of RFSS will not be threatened. In order to evaluate these viability issues, the Forest Service should obtain for each species and population up-to-date information on life history, population trends within the CNNF and the region, and factors limiting population growth or threatening population stability.</p> <p>A review of such information suggests that there are serious concerns about the viability of northern goshawks, red-shouldered hawks, and other forest interior species. Many of those species use older aspen and birch for nesting and other life history needs, particularly in older age classes. Several bird species that are associated with older forests are declining in the region and across the Forest itself. Data gathered by the Natural Resources Research Institute” [Danz et al 2007] “and the Wisconsin Checklist Project” [Rolley 2007] “reveal that many key species of birds in the region are declining. A recent update of Chequamegon-Nicolet monitoring found that 16 bird species had declined while only five increased, noted that “widespread declines . . . are mainly found in mature forest habitats,” and concluded that it “would be prudent to curb further reductions in average forest patch sizes and age on the landscape”. [Danz 2007]</p> <p>“To comply with NFMA’s viability requirement, the Forest Service must fully analyze the issues discussed above to ensure that the Lakewood Southeast project and other past, present, and reasonably foreseeable logging and road-building activities in the Chequamegon-Nicolet will not threaten the viability of red-shouldered hawks and northern goshawks. Moreover, the Forest Service must adequately monitor populations of these species, which are listed as Management Indicator Species (“MIS”) under the 2004 Forest Plan. Prior to approving the project, the Forest Service must adequately account for how MIS population trends are being affected by logging in the CNNF, as it is required to do under the 2004 Forest Plan, in order to ensure that the proposed logging and road-building do not compromise the health of the Forest ecosystem.</p> <p>In the absence of rigorous population monitoring, the Forest Service must base any assessment of population viability on a complete and accurate estimation of suitable habitat available for these species. <i>Sierra Club v.</i></p> | <p>shouldered hawks-Methods, this explains models used for both hawks.</p> <p>Literature from across North America indicates that goshawk and red-shouldered hawk have habitat preferences that go beyond 1) forest type, 2) age of the stand, and 3) canopy cover. The CNNF is familiar with this literature and chose the above three variables because they are assumed to represent the larger suite of variables (including tree height, stand basal area, amount of large woody debris and snags) that have been shown to be related to the species’ habitat preferences. Different forest types are defined by the tree species diversity within the stand. The age of the stand is correlated with the tree height, is expected to be correlated with the accumulated amount of large woody debris (LWD), and snags within the stand. Therefore, older stands have more of these elements. It is recognized that the relationships between stand age and these other variables may not be linear but they are positive (height: Carmean et al 1989; LWD in 40+ year old stands: Gore and Patterson 1986). The outcome of a review of the literature resulted in setting an age cut-off (50 years) by which time it is expected that the tree heights and diameters, and LWD accumulation have exceeded the minimums suggested in the literature for</p> |



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|    |           | <p><i>Marita</i>, 46 F.3d 606, 621 (7th Cir. 1995); <i>Idaho Sporting Congress, Inc. v. Rittenhouse</i>, 305 F.3d 957, 971-73 (9th Cir. 2002). The Forest Service must ensure that it considers <u>all factors</u> that are relevant to the suitability of habitat.</p> <p>For northern goshawk and red-shouldered hawk, for example, relevant factors include: canopy closure, tree height, stand basal area, tree species, open understories, size and amounts of coarse woody debris and standing snags, tip-up mounds, slope, predators, fragmentation, edge, and patch size, and/or proximity to water (for red-shouldered hawk) or human disturbances (for northern goshawk)[McLeod 2000, etc.]. In evaluating factors relevant to the suitability of habitat for these sensitive hawk species, the Forest Service should also consider post-fledgling areas and foraging areas, not just nesting habitat. Such areas are typically larger than the nesting habitat, but are critical to a species' survival" [Boal et al 1994]. "These elements must be factored into the habitat suitability model that the Forest Service is using as the basis of its cumulative impacts and viability analyses.</p> | <p>these species.</p> <p>For monitoring see the BE Section 6.1.2.3 and the FEIS 3.4.3.</p> <p>Suitable habitat, foraging, and fledgling is in the BE, Section 6.1.2.3, and the FEIS Sections 3.4.3 and 3.6.2.</p>   |
| 27 | 12c       | <p>Additionally, the Forest Service should calculate and report the total amount of suitable habitat for northern goshawk and red-shouldered hawk that has been lost in each ranger district over the past 5 years, 10 years, and 40 years. In order to understand the long-term trends for these species on the CNNF, it is important to understand the total aggregate loss of suitable (and occupied) habitat that has occurred over these administratively-relevant time frames.</p> <p>If the Forest Service decides to move forward with the Lakewood Southeast project, we strongly recommend that the agency develop an explicit monitoring plan that will evaluate RFSS responses to the timber harvesting that takes place. A monitoring program of this nature would provide valuable data that will assist the Forest Service and other stakeholders in better managing the resources of the CNNF.</p>   | <p>The suitable habitat loss analysis has actually already taken place because current habitat conditions account for past management activities and environmental events that have affected those habitats. The current conditions of those habitats were then incorporated into our RFSS habitat effect models that determined the amount of suitable habitat at several spatial scales (St. Pierre 2010). These modeling processes were judged to be reasonable and adequate in challenges at the District Court level (decisions favoring the CNNF's process in these cases began to accumulate in 2009 beginning with the Twentymile project). Analysis of the changes</p> |

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|    |                  |  | <p>from historic habitat conditions leading up to 2004 were described in the forest plan FEIS (cumulative effects to landscape pattern) on pages 3-108 to 3-109. The results of that analysis is that implementation of the 2004 forest plan is expected to lead to larger blocks of hardwood forests. In addition, our modeling of nesting habitat for forest raptors shows an increasing trend for habitat also. In 2005, a detailed digital analysis of nesting habitat for raptors began on the CNNF with our GIS based Suitability Habitat Models. Using that data as a base line, we can compare current habitat conditions for trend analysis. Goshawk habitat has increased on the district by 6,270 acres and on the NNF by 20,060 acres. Red-shouldered hawk habitat on the district has decreased by 267 acres and increased on the NNF by 9,423 acres. The decrease in upland hardwood habitat is only 0.1 % of the total available. In addition, it was expected and identified in the forest plan and includes the unexpected loss of habitat due to the 2007 Quad County Tornado. See response #27-8 for information on the current condition of mature interior hardwood habitat and its increase on the CNNF (St. Pierre 2012).</p> |
| 27 | 13               | “In conducting its analysis of possible effects on RFSS, the Forest Service should survey each of the proposed | Analysis of effects to RFSS plants are found in the plant  |

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|    |           | timber sale locations for occurrences of goblin fern, Mingan's moonwort, and blunt-lobed grapefern. Potential impacts to the American ginseng must also be closely scrutinized given the adverse effect that deer, a species that thrives in early successional habitats, have on ginseng populations". [Farrington et al 2009].  | section of the BE and Section 3.4.8.2 of the FEIS for the ferns. Issues related to deer herbivory are discussed in response #27-17.  |
| 27 | 14a       | <p>"As the notice and associated maps indicate, the Lakewood Southeast project area contains important water resources, including lakes and cold water or native trout streams. The Forest Service must fully analyze potential impacts to water quality across the entire project area to ensure that these water resources are not impaired by the proposed logging and road construction activities. Road construction and timber harvesting have the potential to create adverse impacts to aquatic habitats, including increases in water temperatures, loss of terrestrial food (insects and leaves) used by aquatic organisms, and sedimentation caused by stream crossings, heavy equipment, and harvest activities in close proximity to the riparian zone." [Allen 2003, etc].</p> <p>"The Forest Service's analysis should address each of these aspects of aquatic ecosystem and wetland health, including aquatic organisms such as amphibians and reptiles, for which the Forest Service has identified no indicators to date."</p> | <p>The CNNF has conducted an Aquatic Ecological Classification and Inventory for the streams within the forest boundary. The ecological units, called valley types, are based on stream bank full width, alkalinity, maximum water temperature, and aquatic biota (fish and mussels). Most of the streams within project area are mainly 0-20 feet wide, with moderate alkalinities and range in water temperature from mainly cold (&lt;23°C), cool (&gt;23 to &lt;26°C) (one stream) or warm (&gt;26°C) (three streams) (USFS 2004). By understanding the stream classification within the project area, silviculture prescriptions can focus on activities that would enhance the stream's aquatic habitat. The CNNF focuses management on habitat to protect aquatic organisms. Within the project area, there are 3,297 RMZ acres. The proposed harvest methods promote conversion to long lived species in the riparian areas. Over time conversion to long lived species would provide large woody debris for the aquatic and terrestrial portions of the riparian area, soil and bank stability, diverse and productive sites for aquatic and terrestrial plants and animals. The upland terrestrial component</p> |

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|    |           |  | of riparian areas should consist of large long-lived, tall trees appropriate for the site that provide shade, debris, large woody debris, shoreline and bank stability and overhead cover. Maintaining healthy riparian ecological function provides for macroinvertebrate and fish habitat as well as shade to maintain cold or cool water temperatures. Therefore, this analysis focuses on aquatic organism habitat to protect aquatic organisms found through the ecological classification system.  |
| 27 | 14b       | “Any discussion of impacts to water quality and riparian habitat should also identify the acres of proposed logging and miles of road-building activities within Riparian Management Zones in the project area and should fully and fairly analyze the impacts of those activities.”   | See FEIS, Section 3.9.2, RMZ   |
| 27 | 14c       | “In other proposed timber sales, the Forest Service has not fully analyzed impacts to water quality from logging and road construction and reconstruction but has instead asserted that impacts to water quality will be negligible because Best Management Practices (“BMPs”) will be applied. (See Twentymile Project EIS at 3-142). If the Forest Service takes this position in the Lakewood Southeast EIS, the Forest Service must demonstrate (a) that Wisconsin BMPs are adequate; (b) that they are effective; and (c) that these BMPs will be correctly applied where needed. A thorough analysis of water quality impacts is particularly important given the generally poor quality of water resources throughout the CNNF and the important water features within the project area.” | See FEIS, Section 3.9.2, RMZ’s. The commenter indicates that BMPs are either optional or inadequate to prevent water quality impacts. For the Twentymile project, the CNNF reviewed comments for both key and minor issues. Issues are points of discussion, debate, or dispute about environmental effects. There is a discussion of Issue 15 – Adequacy of the BMP’s in Twentymile EIS. By defining an issue as minor, the Forest Service is not implying that BMPs are inadequate to protect water quality; it simply means that it was a topic to discuss. WDNR research division is currently conducting a research project entitled “ <i>Effectiveness of Riparian</i> |

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|    |           |         | <p><i>Management Zone Best Management Practices for Preserving Stream Health in Timber Harvest Areas</i>". The objective of the study is to determine if there are any meaningful changes to stream habitat, fish assemblages, and macroinvertebrate assemblages after vegetative treatments utilizing BMP's for water quality. Preliminary results suggest that they have not been able to detect significant changes in composite habitat and fish measures after harvesting under existing BMP guidelines (WDNR 2010). The study is ongoing. The commenter indicates that the size of buffer strips for non-navigable and navigable intermittent streams may be inadequate based on a study published by Kifney et al. This study is not applicable to the project area as the study was conducted in headwaters streams of southwestern British Columbia where stream gradients ranged from 4-16% characterized by thin glacial till underlain by igneous bedrock. This study focuses on high gradient streams where clearcuts timber harvests were the only harvest method used. Stream gradients range from 0.01-0.3% (FS 2004) on the CNNF, according to stream classifications. The project proposes selection, commercial thinning, and selection with under-plantings as the main harvest methods within the projects RMZs.</p> |

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|    |           |   | The project area and use of this study to draw conclusions would be too dissimilar to compare.   |
| 27 | 15        | <p>“The Lakewood Southeast project scoping notice indicates that 28.6% of the project area consists of 8E, 8F, and 8G MA lands. The March 31 Notice does not specify where these lands are located or how they related to those areas proposed for logging activities. Nor does the Notice The March 31 Notice does not mention potential impacts to other critical or special management areas within the CNNF, such as 2B, 5B, 6A, and 6B areas. The Forest Service must ensure that its activities, including associated road-building and other maintenance, do not compromise the character of these unique natural areas. Studies show that old-growth conditions are disappearing on the Chequamegon-Nicolet. These areas provide key opportunities for wilderness recreation in the National Forest as well as important undisturbed wildlife habitat for sensitive species.</p> <p>The Forest Service must ensure that its activities, including associated road-building and other maintenance, do not compromise the character of these unique natural areas. The agency must document State-or federally-recognized special management areas, identify their relative proximity to proposed logging and road-building activities, and evaluate the direct, indirect, and cumulative impacts of those activities on these areas. And given the extreme scarcity of old-growth or near-old-growth stands of white pine, red pine, and hemlock, thoroughly explain how the project will affect such stands.”</p> | <p>A discussion of effects to ecological reference areas (MA 8 E, F, and G) can be found in Section 3.10.2 of the EIS.</p> <p>There is no MA 2B, 5B, 6A, or 6B in the project area. Adjacent MA’s are 2A, 2B, 3C, 8F, and 8G.</p> <p>This project was redesigned by the IDT after the scoping to ensure that adjacent actions complement the MA 8s.</p> <p>A management area map is posted on our website. FEIS and its’ Appendix A lists proposed actions by stands, including MA for each stand.</p> |
| 27 | 16        | <p>“The Forest Service should likewise pay special attention to impacts to other unique characteristics, such as State or federally recognized wild and scenic rivers”. Show management area and riparian corridors.</p>  | <p>There is no State or Federal wild and scenic rivers in the project area. The riparian corridors are shown on the topographic maps.</p>  |
| 27 | 17        | <p>“The causes and consequences of the current overabundance of white-tailed deer in the project area and throughout northern Wisconsin must also be studied. The current chronically high deer populations are largely the result of landscape composition (particularly young aspen) and predominant patterns of logging in the National Forest. Recurring and large-scale clearcuts are</p>  | <p>The CNNF disagrees with the assertion that deer populations in the project area are overabundant. The issue of Canada Yew is addressed Section 3.6.2. In that analysis, we provided WDNR data that reports the deer</p>   |

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|    |           | <p>known to contribute directly to deer overabundance...the Forest Service must consider (a) impacts to the existing deer population from any proposed aspen clearcuts and (b) impacts to forest conditions as a result of these changes in deer population.</p> <p>Deer at their current high densities are known to act as a “keystone” herbivore within the forests of northern Wisconsin” [Waller &amp; Alverson 1997]. “There is significant literature regarding the impacts that deer have on regenerating forest tree seedlings and understory plant diversity, generally” [Cote 2004]. “In particular, deer have curtailed the successful regeneration of northern white cedar... eastern hemlock ..., yellow birch..., white pine...and northern red oak ...across most sites in northern Wisconsin” [Anderson 1979, etc]. “The Wisconsin DNR has noted that (a) cedar and hemlock regeneration are only possible if a deer herd is predicted to be “dramatically lower for at least a ten-year period,” and (b) if cedar, hemlock, yellow birch, or Canada yew are present, it is not advisable to manage aspen in the same area due to potential impacts from deer” [DNR] “deer also seriously impact American</p> | <p>populations in the project area are below management goals. Also discussed is how deer populations are influenced by many factors (weather, baiting, and hunting) that are beyond the control of the FS and thus not dictated solely by aspen management (Quinn et al 2006).</p> <p>The WDNR literature reference on cedar, hemlock, and deer is from Silviculture and Forest Aesthetics Handbook, which is a handbook that provides a suite of tools and resources to assist private and industrial foresters to engage in actively managing Wisconsin's forests. That reference is from Chapter 43 that is about Aspen marking guidelines and on p. 18 presents sections on Effects of Aspen Management on Neotropical Forest Migrants and a “Summary of Landscape Considerations”.</p> <p>The CNNF believes that this reference does not provide information associated with their statement about deer, cedar, and hemlock. The following statement is the only information provided on p. 43-18 that relates to those topics and it does not support it:</p> <p><i>“What are the local and regional issues surrounding deer density (e.g. car-deer collisions, hunting opportunities, local economy)? Are there issues with herbivory in the surrounding LTA (e.g. lack of regeneration of hemlock, yellow birch, cedar, or Canada yew; excessive</i></p> |

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|    |           |   | <p><i>browsing of lilies and orchids)?”</i></p> <p>The CNNF was unable to respond directly to the reference “deer also seriously impact American ginseng populations” (Doepker and Ozoga) due to this literature reference had no article title, journal issue or volume number, date or page numbers. Only information provided about the information was a title of the magazine the authors past work had appeared in, which was a non-peer reviewed scientific journal (Deer and Deer Hunting).</p> <p>The Van Deleen reference presents factors that influence deer populations and include habitat management, winter severity, baiting and feeding and deer hunting. The CNNF agrees that those issues can influence deer population.</p> |
| 27 | 18a       | <p>“The Forest Service must fully and fairly consider the role that past, present, and reasonably foreseeable logging, road building, and related actions have had and will have on the spread of invasive species in the Lakewood Southeast project area and the CNNF in general. The scoping notice for the Lakewood Southeast project does not address concerns related to nonnative invasive species, pests, or pathogens. But there are numerous invasive species – including spotted knapweed, garlic mustard (<i>Alliaria petiolata</i>), Eurasian honeysuckles (<i>Lonicera X bella</i>, <i>L. tartarica</i>, etc.) and European buckthorn shrubs (<i>Rhamnus cathartica</i>, <i>R. frangula</i>), oriental bittersweet (<i>Celastrus orbiculata</i>), leafy spurge (<i>Euphorbia esula</i>), Orange hawkweed (<i>Hieracium aurantiacum</i>), ox-eye daisy... wild parsnip (<i>Pastinaca sativa</i>) – that could be spread due to the logging and road building proposed here” [Rogars et al 2009].</p> <p>“The Forest Service must study what impacts the</p> | <p>Invasive species are addressed in Section 3.7.2 and 3.7.3 of the FEIS.</p>  |



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|    |           | timber sale would have on the spread of these and other invasive species, what impacts the spread of invasive species would have on the forest, and whether the protective measures designed to prevent the spread of such species are effective.”  |   |
| 27 | 18b       | “Fragmented forests like the Chequamegon-Nicolet are also more likely to be invaded by non-natives, including pests and pathogens such as West Nile Virus, which particularly threatens the red-shouldered hawk – a species that merits special attention in the EIS given the importance of red-shouldered hawk habitat in this area” [Ruiz 2010]. | <p>The CNNF disagrees with the assertion that the CNNF is fragmented. In the forest plan FEIS (pages 3-93 to 3-109) we describe the overall decrease in fragmentation of the National Forest through increases of interior forest, mature hardwood interior forest, northern hardwood patch size, and reduction in road densities resulting from implementation of the forest plan. For more information on the increase of mature interior hardwood habitat on the CNNF, see response to #27-08.</p> <p>The paper cited did not make a conclusion or reference that American robin are a primary reservoir host of West Nile Virus in northern Illinois. The papers only mention of the American robin in the paper was within the ‘Background’. It stated <i>“Many competent avian hosts have been identified both in the lab and field [8], and recent work in parts of North America have focused on the possible important role of American Robins (Turdus migratorius) in contributing to virus amplification and maintenance in the sylvatic cycle.”</i></p> <p>The commenter indicates that there would be an increase in West Nile Virus (WNV) cases due to an increase in</p> |

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|    |           |         | <p>American robin populations. This is a result of harvest treatments creating more edge. The CNNF disagrees with this due to the above and data shows that WNV occurrences have been very low even though American robins have been one of the most common and densely populated birds on the CNNF. Records of WNV occurring in wildlife and humans over the past 10 years in Forest, Oconto, and Langlade Counties have been extremely rare. Detection in birds occurred within Forest County in 2007 (2 cases) and in 2006 there were reported cases in Forest, Oconto, and Langlade (no data on number of cases) and in 2003 within Oconto. Human detection only occurred once in 2012 in Langlade County. No specific locations were given for these cases so it is possible they occurred in a part of the county that is not national forest (WDHS 2013). These very low occurrences occurred even though the American robin is the 7th most common bird species recorded on the Nicolet National Forest Breeding Bird Survey. In addition, the robin is ranked 3rd on the average abundances of bird species in point counts (numbers = average observed /100 point counts). The data analysis was collected between 1995 and 2011 through a partnership with UW-GB and includes 141 bird species and 317 survey points across the</p> |

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|    |                  |  | NNF (Niemi et al, <i>manuscript in prep.</i> ).        |
| 27 | 18c              | “The threat of exotic earthworms should also be thoroughly assessed” [Gundale, etc].   | Earthworms are discussed in Section 3.7.1 of the FEIS. |
| 27 | 19               | <p>“The Forest Service must thoroughly analyze the climate change implications of the project’s proposed timber harvest, road-building, and related activities. To satisfy the requirements of NEPA and NFMA, the agency must consider both the mitigation and adaptation consequences of this project.</p> <p>Scientific findings from the Chequamegon Ecosystem Atmosphere Study (ChEAS), among other studies, demonstrate that forest management and disturbance activities are key factors in whether a terrestrial landscape produces or effectively sequesters carbon dioxide” [Chen et al 2004]. “The CNNF has the potential to serve as a significant carbon sink in North America if it were allowed to recover from frequent disturbance” [Davis et al 2003]. “However, widespread harvest and regeneration of younger forest has slowed the rate of carbon uptake in the CNNF.” [Davis et al 2003]</p> <p>Scientific evidence indicates that young forests are large carbon sources that may only become effective sinks as they age” [Desai 2004]. “Moreover, fragmented forests and frequently disturbed forests release greater amounts of carbon dioxide than mature, interior stands and therefore never reach their full potential as effective carbon sinks” [Chen]. “The Lakewood Southeast project is just one of numerous logging projects proposed Forest-wide that would release significant amounts of stored carbon into the atmosphere” [Navea et al 2010]. “NEPA requires full and fair consideration of this kind of cumulative impact, as new guidance issued by CEQ suggests” [CEQ].</p> <p>“Equally important, this project should be analyzed in terms of its potential to affect the development and protection of climate-resilient habitats within northern Wisconsin. The need to consider the adaptation values of forest landscapes has been a central focus of the Climate Change Response Framework currently being developed for the CNNF.</p> <p>Fortunately, the Lakewood Southeast project can benefit from the Climate Change Response Framework. The Framework represents an effort to integrate climate change science with on-the-ground management. The Lakewood Southeast project therefore represents an ideal opportunity to incorporate climate change science into a</p> | See the FEIS, Section 3.10.4.                          |

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|    |           | <p>forest management decision-making process. Accordingly, the Lakewood Southeast project should be analyzed with the benefit of the Vulnerability Assessment, Mitigation Assessment, and the Framework. The approaches and strategies outlined in the Framework document.” [Forest Adaptation Resources 2011] “It is our understanding that the Ecosystem Vulnerability Assessment and Synthesis, a draft of which is also posted on this website, has now been finalized. The scientific research and learning should be reviewed, evaluated, and incorporated into the environmental review and decision-making processes for the Lakewood Southeast project. Doing so will help to ensure that this forest landscape benefits from the technical analyses and management insights being generated in the Framework process. And it will address the “clear and pressing need to bridge the gap between climate change research and actual management activities on National Forests.” [CNNF 2010]. “Given that this project will influence the long-term health and resources of the CNNF, an analysis of climate change impacts will also help ensure that the Forest Service does not irretrievably commit resources without the benefit of the Framework process. Similarly, the Forest Service should also consider the climate change data and reports being generated by the Wisconsin Initiative on Climate Change Impacts (“WICCI”)” [website].</p> <p>“Unfortunately, to date it appears that the Forest Service has not grasped this opportunity. The need for a thorough analysis of both the mitigation and adaptation consequences of the Lakewood Southeast project is underscored by the absence of any such discussion in the March 31 Notice. It is imperative that the Forest Service fully and fairly consider the climate change implications of this project” [CNNF 2010]. “And if the Forest Service ultimately approves this project, it should include a set of monitoring indicators to measure the effects of this project on carbon flux.”</p> |  |
| 27 | 20a       | <p>New alternative should “Defer all proposed clearcuts or shelterwood harvests in white or red pine stands over 80 years of age, to promote continued progress toward “old growth” habitat conditions, and defer logging of any kind in white or red pine stands over 100 years of age. Defer all proposed logging in hardwood stands over 80 years of age, to promote continued progress toward “old growth” habitat conditions, including high levels of downed woody debris. Increase the number of large trees,</p>  | <p>Alternative 4 was created to address these concerns. Alternative 4 in Chapter 2 shows which of these requests were included in the alternative development.</p> |

Appendix E-Comments and Responses- Lakewood Southeast Project

| ID | Comment # | Comment  | Forest Service Answer  |
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|    |           | <p>including early successional species (such as aspen), retained in cutting units; Increase the size and number of large downed woody debris in cutting units, particularly near riparian zones and wetlands; Incorporate timber harvest prescriptions that do not result in increases in soil temperature in cutting units; Eliminate proposed logging within 30 meters of any stream, lake, or other water body in the project area, except to facilitate succession to longer-lived species. Close and decommission additional roads in the project area, and reduce the amount of proposed road construction, particularly in Riparian Management Zones.</p> <p>Eliminate all proposed even-aged treatments within 400 meters of Canada Yew, if any, and yellow birch sites to reduce amounts of new forage for white-tailed deer. Defer all logging within 500 meters of historic or current northern goshawk or red-shouldered hawk nest sites, if any.</p> <p>Ensure that all logging activities for this project fully adhere to Forest Plan guidelines. Those guidelines are important for the protection and continued viability of RFSS such as the red-shouldered hawk and northern goshawk”.</p> |  |
| 27 | 20b       | Please implement Alternative 4 rather than the preferred. This alternative allows natural succession of aspen, reduces clearcutting, and limits road construction.   | The Deciding Official will consider all comments and analysis in his decision. He will make his decision based on effects on resources, both positive and negative, and weigh the outcome as a whole. Impacts can be easily seen and compared in the charts at the end of Chapter 2. |
| 28 | 1         | The decline in harvest has devastating effects the economies of northern Wisconsin.  | Thank you for your comment.  |
| 28 | 3         | What species are present in aspen stands with a 110-120 BA, should these be classified as aspen?   | These stands were recently examined and do type out as aspen stands. They are aspen types with components of oak, hardwood, and pine.  |
| 28 | 4         | Where are the other acres of aspen that are to be converted? Percentage and acres, as well as species composition should be discussed across the project area instead of certain MA's.   | The FEIS shows this on Table 1.2.1.1. The treatment tables and maps included in FEIS Appendix A show which aspen stands are being converted (thinnings and   |

Appendix E-Comments and Responses- Lakewood Southeast Project

| ID | Com<br>ment<br># | Comment  | Forest Service Answer  |
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|    |                  |  | shelterwoods) their locations. Our forest's protocol is to evaluate composition percentages at the MA level.   |
| 28 | 6                | Jack pine is declining, it provides habitat for species of concern. Since you are not meeting ASQ's, why follow the forest plan on reducing aspen and jack pine? | Attainment of the ASQ is a larger issue based on funding and resources. We are trying to follow forest plan direction in this area and at this time to the best of our ability. In response to your concerns of aspen and jack pine decline, we developed Alternative 3. |
| 29 | 2                | Deer are declining   | Management of white tailed-deer populations and harvest quotas are controlled and determined by the WDNR.  |
| 29 | 3                | Judge has stopped some logging, but I hear it will start again.  | Thank you for your comment.  |

**B. Comments during the comment period**

| ID | Com<br>ment<br># | Comment   | Forest Service Answer                            |
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| 27 | 14               | <p>“The DEIS’ analysis of water quality impacts finds that the project’s logging, road building and other related activities would have only “minimal” effects on water quality and, therefore, “would not impair the long-term water quality” because “project design features” will be followed... “This analysis is inadequate because the Forest Service continues to rely on the Wisconsin DNR’s BMPs as “project design features” to protect water resources. (<i>See e.g., Id.</i>). As the commenters have repeatedly pointed out in comments and challenges to past CNNF projects, the BMPs are not adequate to prevent water quality impacts from logging activities. (<i>See e.g., HEC &amp; ELPC, Park Falls Hardwoods Draft EIS Comments, May 7, 2012</i>). The BMPs’ problems have been detailed to the Forest Service in the past and the Forest Service has recognized that they may be inadequate. (<i>See Twentymile EIS at 1-27</i>). The overarching problem with the BMPs is that their requirements</p> | See response to comment 27-14a and b, Subpart A. |

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|    |     | <p>contain numerous exceptions and caveats. For many of the standards and guidelines, a project manager can disregard the “best practice” and still comply with the BMPs if the manager deems the standard “impractical” or “not possible”. Moreover, many of the “standards” the BMPs establish are arbitrary and not based on the best available science. For example, the relaxed criterion for the size of buffer strips around non-navigable and navigable intermittent streams (35 feet rather than 100 feet) has no scientific basis. (See DEIS at 115).</p> <p>Headwater streams are often the most vulnerable to effects of disruption of the riparian zones given their generally steeper slopes. A study published in a peer-reviewed journal demonstrates that even a 100 feet buffer is not enough to protect headwater streams from detrimental changes in light and temperatures associated with clearcuts” [Kiffney et al 2003].</p> <p>“The Forest Service should not rely on state standards whole-cloth when presented with information that the standards are insufficient. Requiring the BMPs with minor changes limiting the project manager’s discretion or tweaking BMP standards based on the best available science would go a long way towards ensuring that the lack of water quality impacts the Forest Service asserts in the DEIS is borne out in practice. Therefore, the Forest Service should amend the BMP standards by removing the problematic portions for this and future projects.”</p> |  |
| 27 | 17a | <p>“The DEIS fails to fully account for the projects impacts on the already overstocked deer population and the resulting impact from over-populated deer on species that are harmed by deer browse, such as Canada Yew. The DEIS’ analysis of impacts to the Canada Yew is flawed because it seriously downplays the effects of the project on deer browse. The DEIS asserts that the project will not impact Canada Yew because “risk of damage and loss of individual plants by deer would be minimal”... “This assertion ignores the known and well-documented links between logging, deer browse and Canada Yew. The literature clearly documents the link between increases in edge and early successional or more open habitats, consequent</p>  | <p>See response # 27-17. The commenter indicates that we have ignored the impacts of white-tailed deer browsing and the connection between early successional edge habitat and white-tailed deer populations. We acknowledge that there is much literature that has documented the effects of deer browsing on Canada yew and forest diversity (Allison, 1990; Alverson et al, 1998; Beals, et al 1960; Cote, et al, 2004; Foster, 1993). However, recent research</p> |

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|  |  | <p>increases in habitat suitability for white-tailed deer leading to local population increases, and the direct and controlling impacts of deer on the ability of Yew to survive and reproduce” [Allison 1990, etc]. “To ignore these known impacts, and particularly the effects of timber harvest activities on deer populations, is a serious error that must be corrected in the Final EIS.</p> <p>....In analyzing impacts on the Canada Yew and the other deer-constrained species in the FEIS, the Forest Service must consider (a) impacts to the existing deer population from any proposed aspen clearcuts and (b) impacts to forest conditions as a result of these changes in deer population.”</p> | <p>suggests that understory richness may have no correlation to deer densities and use (Rutherford and Schmitz 2010) or in some cases may enhance plant diversity (Royo et al 2010). Further, recent research also indicates that in some circumstances increasing the amount of early successional forest habitat may actually have substantial impacts on reducing deer herbivory in areas where other desired forest species may be limited by herbivory (Miller et al 2009).</p> <p>The forest plan designated Canada yew as an MIS because of a concern about impacts to Canada yew primarily due to white-tailed deer browsing (forest plan FEIS, p 2-55). It has also been well documented that white-tailed deer utilize and prefer a high edge to area ratio, which is often provided by aspen clearcuts and other early successional habitat management activities (Fisher &amp; Wilkinson 2005; Tomm et al 1981).</p> <p>Within the project area, there are only two locations (2.8% on the district and 0.8% of NNF) and they are located in MA 8G and 8F. None of the action alternatives has proposed harvest treatments in any stands that contain Canada yew so there will be no impact.</p> <p>In general, the forest plan FEIS concluded that a relatively continuous canopy cover would benefit Canada yew. More specifically, the selection harvest of northern hardwoods in the project</p> |
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|    |     |  | would maintain a relatively high canopy closure of 75 to 80% and would be conducive to the growth and establishment of Canada yew in the project area. Impacts from white-tailed deer to Canada yew are in FEIS, Section 3.6.  |
| 27 | 17b | <p>“Deer at their current high densities are known to act as a “keystone” herbivore within the forests of northern Wisconsin” [Waller &amp; Alverson 1997]. “There is significant literature regarding the impacts that deer have on regenerating forest tree seedlings and understory plant diversity, generally” [Cote et al 2004]. “In particular, deer have curtailed the successful regeneration of northern white cedar, eastern hemlock, yellow birch, white pine and northern red oak across most sites in northern Wisconsin” [Cote et al 2004]. “The Wisconsin DNR has noted that (a) cedar and hemlock regeneration are only possible if a deer herd is predicted to be “dramatically lower for at least a ten-year period,” and (b) if cedar, hemlock, yellow birch, or Canada yew are present, it is not advisable to manage aspen in the same area due to potential impacts from deer” [DNR]. “The current chronically high deer populations are largely the result of landscape composition (particularly young aspen) and predominant patterns of logging in the National Forest. Recurring and large-scale clearcuts are known to contribute directly to deer overabundance.”</p> | <p>See # 27-17a, Subpart B. The CNNF recognizes that the Wisconsin white-tailed deer herd was, until recently, at chronically high population levels and we remain familiar with the literature. The CNNF continues to acknowledge that deer can play a role in inhibiting regeneration of some tree species, which is one of the reasons that the forest plan aims to reduce favorable white-tailed deer habitat by creating blocks of interior hardwoods habitats that would provide less preferred habitat for white-tailed deer. Impacts from deer are analyzed in the FES Section 3.6. Overall deer numbers have been reduced in the past several years mainly due to increased harvest permits and a possible increase in predation from an increase in predator populations. The amount of clearcutting has gone down across the CNNF while the deer population was going up prior to 2008. With the amount of deer baiting with corn, the State of Wisconsin increasing deer herd goals by 8% statewide, and coupled with numerous mild winters, the very small amount of clearcutting in the project area cannot be correlated with an increase in deer populations or an</p> |

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|    |     |   | <p>increase in browsing. In addition, all alternatives move the project area to an increase in later successional habitat (aspen habitat decreased), further reducing any potentially related increase in deer populations due to aspen and other early successional habitat.</p>   |
| 27 | 21  | <p>“Alternative 2, pro[sic]scribing logging on 225 acres....Water Resources section of the DEIS states that logging is proposed on 189 acres of trout buffers. (DEIS at 116). It is not clear which figure is accurate.”</p>  | <p>The figure should be 232 for total treatment and 189 acres are being thinned in the trout stream buffers for Alt. 2. The 225 was total acres treated in the RMZ for Alt. 2.</p>  |
| 27 | 22a | <p>“The Lakewood Southeast project allows for significant biomass removal, but the DEIS does not include a cumulative impacts analysis of biomass removal impacts. Likewise, the DEIS does not tier to another impacts analysis, as the Forest Service has not provided any CNNF-wide analysis of the biomass removal it is including in its management projects. The FEIS must contain a cumulative impacts analysis for biomass removal, especially given the absence of any forest-wide analysis.</p> <p>NEPA requires that the Forest Service take “a hard look at environmental consequences”.</p> <p><i>See e.g. Habitat Educ. Ctr. v. United States Forest Serv.</i>, 593 F. Supp. 2d 1019, 1025 (E.D. Wis. 2009). In so doing, the Forest Service “must articulate why it has settled upon a particular plan and what environmental harms (or benefits) its choice entails”. <i>Id.</i> (internal quotations omitted).</p> <p>As part of the ‘hard look,’ NEPA requires a cumulative impacts analysis. This analysis ensures that the Forest Service analyze the Lakewood Southeast project’s impacts in conjunction with “other past, present and reasonably foreseeable future actions” so that impacts from “collectively significant actions taking place over a period of time” are not overlooked. 40 C.F.R. § 1508.25. The DEIS, however, fails to take a ‘hard look’ at biomass removal because it does not include a cumulative impacts analysis and cannot tier to any forest-wide impacts analysis.</p> <p>The Lakewood Southeast project allows significant</p> | <p>See Section 3.8.3 of the FEIS. There would be no detrimental cumulative effects to the soils/LTPs expected from the biomass removal proposed by this project because there have been no known detrimental effects identified from past harvest actions, and no predicted detrimental direct or indirect effects from biomass removal activities proposed in Alternative 2 or 3 of this project. All other CNNF projects that would allow some biomass removal, such as Park Falls Hardwoods, Washburn Red Pine Thinning, or Early successional Habitat Improvement, occur on different LTPs than the LSE project, and would have no potential direct, indirect, or cumulative effects to the soil resource specific to the LSE Project area. Soil resource reports completed for all CNNF projects that would allow some amount of whole-tree removal to date have found there would be no detrimental cumulative effects to the soil resource or long-term productivity of the land</p> |

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|    |     | <p>biomass removal and is not the first or only project in the CNNF to allow large-scale biomass removal. The project calls for biomass removal on 1,597 acres. (DEIS at 5). The Forest Service has also included large-scale biomass removal in past projects, such as the recent Park Falls Hardwoods project, which would allow 30,400 green tons of biomass removal on up to 16,984 acres. (Park Falls Hardwoods ROD at 5; FEIS at 217). However, to date, the Forest Service has not completed any holistic impacts analysis from the biomass removal it is allowing in multiple projects throughout the CNNF...At the very minimum, the FEIS must include a cumulative impacts analysis for biomass removal that examines the cumulative impacts of the Lakewood Southeast project with the Park Falls Hardwoods project and all other recent and foreseeable future projects with biomass removal. Not only is this required by NEPA's general cumulative impacts requirement, but failure to do so would result in absolutely no analysis of the Forest Service's overall biomass removal program. The Forest Service cannot evade its obligation to analyze the impacts from the multiple biomass removal projects it is allowing at various locations throughout the forest by not providing a holistic analysis either through a Forest Plan amendment or a programmatic EIS, and at the same time avoid a cumulative impacts analysis. Doing so prevents a complete picture of the impacts of large-scale biomass removal and is a clear example of the "tyranny of small decisions." <i>Habitat Educ. Ctr.</i>, 593 F. Supp. 2d at 1030. Therefore, the FEIS must include a cumulative impacts analysis of biomass removal impacts including all past biomass removal projects in the CNNF."</p> | <p>from whole tree (bole plus crown) removal. This is because site-specific woody biomass harvesting guidelines are followed, including restricting susceptible soils and retaining recommended amounts of fine woody debris to maintain total site nutrients. Any future proposed whole-tree removal from treatment areas that have had past whole-tree harvests should be evaluated for potential cumulative effects of multiple biomass harvests on total site nutrients with consideration for the latest site-specific soil guidelines and research findings. Potential cumulative effects to the soil resource are reasonably confined to the soil directly beneath where the activity would take place, such as the operation of machinery to cut and remove trees. The removal of nutrients in merchantable tree boles or whole trees (bole plus crown) from one treatment area would not affect total site nutrients or long-term productivity of the land on other treatment areas within or adjacent to this project area or other project areas across the CNNF with similar proposed actions.</p> |
| 27 | 22b | <p>"Because it is a relatively new and significant use of forest resources, biomass removal is an excellent candidate for a Forest Plan amendment, which is allowed "at any time" and "may be broad or narrow, depending on the need for change, and should be used to keep plans current and help units adapt to new information or changing conditions." 36 C.F.R. § 219.13(a). Such an amendment would accomplish a thorough consideration of the impacts and benefits of allowing biomass removal throughout the forest as a</p>  | <p>The Forest Service has been working with the WDNR on Biomass Harvesting Guidelines (BHG) both creating, revising, and monitoring guidelines. A Forest Service IDT reviewed the WDNR's BHG and compared them to the forest plan. Biomass harvest is restricted by forest plan guidelines (such as avoiding</p>   |

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|    |    | whole, rather than through a piecemeal approach that only analyzes each project in isolation, as the Forest Service has been doing thus far. The Forest removal program through a programmatic EIS... The Forest Service should also consider a Forest Plan amendment or programmatic EIS analyzing biomass removal impacts so that its future decisions regarding biomass are fully informed”   | biomass harvest in MA 2B). The 9-17-2009 and 5- 21- 2010 letters to the District Rangers have instructions for biomass guidelines to be incorporated into timber sales.  |
| 27 | 23 | Project should not allow road building in MA 8F.   | Due to forest plan direction and resource concerns, this road construction was dropped.  |
| 27 | 24 | <p>“The second “Purpose and Need” for the project is to “Correct age class distribution” for northern hardwoods, red pine and white pine, among others. (DEIS at 4). For all three of these tree species and classes, the majority of the trees are in the 61-100 year age group (61-120 for white pine) because they were planted by the Civilian Conservation Corps after the original forests in the Northwoods were wiped out in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries. (See DEIS at 16). As a result, there is a greater percentage of trees in the 61-100/120 age group and far smaller percentages for 0-20 and 101/121+ age groups than is outlined in the Forest Plan’s “desired” age class distribution.<sup>6</sup> (See e.g. DEIS at 22-24). To try to move towards the ‘desired condition,’ the project prescribes logging the 61-101/120 age class to increase the 0-20 age class, while simultaneously increasing the 101/121+ age distribution. (DEIS at 22-23, 24).</p> <p>On its face, it is not clear how this plan to log the 60-100/120 aged trees will be able increase both the distribution of 0-20 and 101/121+ aged trees. Intuitively, it seems that logging trees aged 61-100/120 is not a sound strategy to <i>increase</i> 101/121+ aged trees, as the 60-100/120 aged trees will eventually naturally convert to the older age classes. The DEIS recognizes this dilemma as it states that “[i]t would be impossible” to meet the objective of converting the northern hardwoods 60-100 age class to both the youngest and oldest age classes “at the same time”. (DEIS at 22). “No set of treatments today would instantly change the project area to meet all [Desired Forest Conditions] in the forest plan. This would take many entries and much time. But there are some actions that could be taken</p> | <p>FEIS Need 2C shows there is an excess of northern hardwood in the 61-100 year age class and a shortage of 0-20 year old hardwood stands. Using shelterwood regeneration harvests, we would increase the acreage in the 0-20 year age class and decrease the acreage in the 61-100 year age class. There would still be a surplus of acreage in the 101+ year age class. Thus, by regenerating <i>some</i> of the acreage, we are actually getting a net increase in both the youngest <i>and</i> oldest age classes. This is further discussed in the FEIS Need 2C, 2E, and 2F.</p> <p>For red and white pine see #27-9, Subpart A. Need 2E and 2F in the FEIS explains that there is an excess of red and white pine 61-100 and 61-120 years of age, respectively. As stated in the FEIS Need 2E, most of this acreage is in stands 69-77 years of age. It is mainly these stands (and not 100-120 year old stands) that are proposed for regeneration. Again, in this case, some 61-100 old stands would be</p> |

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|    |    | <p>today that would move the area towards those [Desired Forest Conditions.” <i>Id.</i></p> <p>However, the DEIS does not explain what these “actions” are and how they will achieve increasing the oldest and youngest age classes. This dilemma and lack of explanation holds true for red and white pine as well. The DEIS provides tables showing the age class distributions each project alternative would create for red and white pine (no table is provided for Northern Hardwoods), but does not explain the logging amounts, the time scale at which the percentages are measured and how logging the 61-100/120 age class would result in the hoped-for increases in other age classes. (DEIS at 58). The FEIS must include a much more detailed explanation as to how the project will achieve this “impossibility” such that the public can fully understand the Forest Service’s logic.”</p>  | <p>regenerated to increase the young age class. However, there would be more than enough acreage remaining to grow into the 100-120 and 121+ year age classes. Thus, there would be a net increase in the percentage of acreage in both the youngest and oldest age classes.</p> <p>Alternatives 3 and 4 were developed, in part, to respond to the concern about regenerating the oldest age class of red and white pine. No pine stands greater than 100 years would be regenerated in either of these alternatives. However, many pine stands in the 60-79 year range would be regenerated in an effort to address the lack of young pine forest in the project area.</p> |
| 27 | 25 | <p>“In order to fully evaluate the project’s impacts on the eastern timber wolf, a Regional Forester Sensitive Species, the FEIS must include the recent Wisconsin wolf hunt in its analysis.</p> <p>This fall, Wisconsin legalized wolf hunting after the wolf was removed from the federal Endangered Species List, and the state DNR issued proposed regulations on June 6, 2012. The hunting regulations allow taking up to 20 wolves in the hunting Zone where the project area is located. (<i>See WI DNR 2012 Regulations</i>). The taking of up to 20 wolves in the project area is a significant change and the Forest Service must take a ‘hard look’ at how the proposed project may impact the wolf population in conjunction with wolf hunting. For example, it’s possible that new road construction or opening of motorized or non-motorized roads could facilitate hunting. Certainly the Forest Service is not responsible for this policy change, nonetheless, NEPA requires that it include this significant new wolf impact in conjunction with the proposed project.”</p> | <p>Analysis of the 2012 wolf hunt and project road management effects to wolves are addressed within the BE Section 6.1.2.1 and in the FEIS, Section 3.4.1.2.</p>  |

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| 27 | 26 | <p>“The Forest Service must update the FEIS to include the impacts of unexpected winter thaws on soils and water quality and should also develop guidelines for operating machinery during winter thaws. In many situations, the Forest Plan guidelines and project requirements restrict logging activities to frozen ground only in order to avoid soil impacts, such as compaction and rutting, and to prevent sedimentation that has severe water quality impacts. (See e.g., DEIS at 45 (Water Quality Protection Requirement D3 restricts activities near riparian areas that are wet near the surface year-round to only when the ground is frozen)). The DEIS claims these frozen ground restrictions limit the project’s soil and water quality impacts. For example, it states that the “[p]otential for long-term detrimental compaction or rutting is minimized by limiting the operating conditions to dry or frozen ground”. (DEIS at 104).</p> <p>The DEIS, however, does not consider the impacts that would result from unexpected winter thaws. Unexpected thaws could result in soil and water quality impacts that the frozen ground restriction is meant to prevent if ground thaws mid-winter where logging activities have already started on previously frozen ground. The Forest Service recognizes the potential for unexpected thaws and their impacts. In the 2005 Camp Four timber sale, the Water Specialist’s Report stated that “[a]lthough some of the project areas have a winter logging provision, unseasonably warm temperatures may develop during frozen conditions that can create operating problems, where the potential for rutting, compaction, and soil erosion may increase.” (2005 Report at 19). Yet the DEIS makes no mention of the potential for mid-winter thaws or their potential impacts. This omission is particularly problematic because mid-winter thaws and previously “unseasonable” temperatures are increasingly likely due to climate change. The Forest Service’s Climate Change Response Framework 2011 report analyzing potential climate change effects in the CNNF, “Ecosystem Vulnerability Assessment and Synthesis,” finds that temperature increase is “virtually certain” with “[e]ven the most conservative models and</p> | <p>The previous and current forest plan soils guidelines and soil-specific recommended operating seasons, along with timber sale administration and contract provisions, has been successfully addressing this concern for decades. Northern Wisconsin has commonly experienced winter thaws and they are expected and dealt with by CNNF Timber Sale Administrators through timber sale operations, which shut down per contract specifications. See FEIS, Soils Section 3.8.2 (Action Alternatives, Soil compaction and rutting).</p> <p>If there is a winter thaw and the ground is no longer frozen, then the soil guideline would not be met and operations would be stopped, which we successfully do each winter. Annual soil impact monitoring continues to show this and is documented in the CNNF annual and five year Forest Plan Monitoring Reports. See the FEIS, Section 3.8.2 (Cumulative effects, past actions).</p> <p>Also, see the FEIS, Section 3.8.1, Affected Environment, last paragraph on winter climate.</p> <p>Ninety-nine percent of this project area where heavy</p> |
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|    |   | scenarios project[ing] an increase in average temperature in northern Wisconsin.” (2011 Report at 70). Moreover, “[t]hese increases are projected to be greatest in the winter,” albeit with “daily lows more affected than daily highs”. ( <i>Id.</i> ) With increasingly warm winters, it is more and more likely that there will be thaws at various times throughout the winter. The Forest Service clearly recognizes this change and its potential impacts. Therefore, NEPA requires that they be included in the FEIS. In addition, the Forest Service should update its frozen ground requirement and operating guidelines to explicitly require frozen ground-restricted logging activities to immediately stop when the ground thaws, and to include procedures to best prevent impacts during an unexpected thaw.”  | equipment use is proposed is comprised of well drained sandy soils that are not readily subject to rutting or compaction, with one percent or less requiring frozen ground operations to avoid soil rutting or compaction. FEIS states that about 134, 81, 43 or acres (1, <1, or <1 percent) of proposed harvest that requires winter only operation of heavy equipment in Alternatives 2-4 respectively.   |
| 27 | 7 | The Forest Service should institute a 124-acre goshawk nest buffer rather than a 30-acre buffer in the Lakewood Southeast project... The DEIS applies a 30-acre nest buffer to reduce the impacts from logging and the attendant human activities on rare goshawk nesting sites. As part of the Long Rail project settlement, however, the Forest Service instituted a 124-acre nest buffer in that project to study the effectiveness of the larger buffer. (Long Rail Settlement Agreement at para. 3). To our knowledge, the study’s findings have not been finalized or released. In the meantime, the Forest Service should err on the side of caution and protection by applying the 124-acre buffer until it demonstrates that a 30-acre buffer is as effective. The cautious approach is especially appropriate given the goshawk’s viability concerns and its status as a MIS and RSFF. | The signed Long Rail Project Appeal Deposition Agreement (Appeal No. 07-09-13-0012 A215) between the Forest Service and ELPC states that implementation of 124-acre nest buffers only pertains to the Long Rail Project area and not to any other project management areas on the CNNF. Any goshawk or red-shouldered hawk nest would be protected following the guidelines of the forest plan (p. 2-20 to 2-21). This includes a 30-acre buffer surrounding the nest where no activities would occur and out beyond this 330 feet, only activities that do not lower canopy closure below 80 percent and that are considered uneven-aged management could occur. These guidelines are consistent with the WDNR working guidelines for forestry (Woodford 2008, p. 01) and are also supported by goshawk researcher T. Erdman who has indicated that these protection measures |

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|    |   |   | are sufficient (Erdman, T. 2003. Unpublished report on the effectiveness of 30 acre buffers).   |
| 31 | 1 | We need to preserve our natural heritage.                         | Thank you for your comments. Effects on all resources will be weighed by the Deciding Official for both short and long-term.  |
| 35 | 1 | <i>Use “biological” basis for mgt. - not short-term gains.</i>    |   |
| 39 | 1 | Keep overall long-term health of the forest ecosystem.            |   |
| 42 | 1 | <i>Forest provides critical habitat for thousands of species.</i> |   |
| 44 | 1 | It’s a disservice to clearcut aspen and perform road work.        |   |
| 47 | 1 | <i>Forests are priceless places. We need to keep it as such!</i>  |   |
| 48 | 4 | LSE will have a negative effect on resources.                     |   |
| 50 | 1 | <i>Forests are our lungs.</i>                                     |   |
| 51 | 6 | Resources need to manage for health and safety.                   |   |
| 52 | 1 | <i>The CNNF is an important resource.</i>                         |   |
| 55 | 1 | Save the CNNF!  |   |
| 60 | 3 | <i>Use only scientists trained in sustainable forestry.</i>       |   |
| 61 | 1 | Strongly support the listed initiatives outlined above.           |   |
| 62 | 4 | <i>No short-term gain-maintain healthy ecosystems.</i>            |   |
| 63 | 1 | Allow only careful selective cutting.                             |   |
| 64 | 5 | <i>Protect biodiversity and maintain water quality.</i>           |   |
| 68 | 5 | I appreciate your effects in this direction.                      | Comments are outside the scope of this federal project.   |
| 69 | 1 | <i>Forest provides crucial habitat for thousands of species.</i>  |   |
| 31 | 2 | I will not visit parks during hunting season.                     |   |
| 37 | 1 | <i>Parks are American heritage- no development.</i>               |   |
| 38 | 1 | Hunting in parks until middle of May is insane.                   |   |
| 44 | 4 | <i>Sporting Heritage law (Act 168) frightens me.</i>              | Thank you for your comment.<br><br>The Deciding Official will consider all comments and analysis in his decision. He will make his decision based on effects on resources, both positive and negative, and weigh the outcome as a whole. Impacts can be easily seen and compared in the charts at the end of Chapter 2. |
| 49 | 1 | The DNR should let people know what is going on.                  |   |
| 32 | 1 | Please implement Alternative 4 rather than the preferred.         |   |
| 33 | 1 | This alternative allows natural succession of aspen,              |   |
| 34 | 1 | reduces clearcutting, and limits road construction.               |   |
| 36 | 1 |   |   |
| 39 | 2 |   |   |
| 41 | 1 |   |   |
| 42 | 3 |   |   |
| 43 | 1 |   |   |
| 46 | 1 |   |   |
| 48 | 1 |   |   |
| 51 | 1 |   |   |
| 52 | 1 |   |   |
| 56 | 1 |   |   |
| 57 | 1 |   |   |
| 58 | 1 |   |   |
| 59 | 1 |   |   |
| 60 | 1 | Some forest in Wisconsin are sensitive to change-Alt. 4           |   |
| 62 | 1 |   |   |
| 64 | 1 |   |   |
| 65 | 1 |   |   |
| 66 | 1 |   |   |
| 67 | 1 |   |   |
| 68 | 3 |   |   |



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| 69 | 2    |   |   |
| 32 | 2    | Prohibit logging on the banks and it the buffer zones   | The science behind the “no aspen trout buffer” is in the FEIS, Section 3.9.1, Trout Streams. Beaver can adversely affect trout habitat by blocking migration, reducing shade through flooding, increasing water temperature, causing sedimentation of spawning areas and altering habitat, which causes increased competition from other species. The peer-reviewed science is referenced in the 2002 USDA Forest Service report “Issue Based Aquatic Assessment for the Chequamegon-Nicolet NF Plan Revision Report”. The Hannibal paper has no scientific backup, so we cannot review and answer it. The peer reviewed paper (Fuller et al 2011) provided by the commenter is not applicable to low gradient streams in northern Wisconsin. The paper examines downstream temperature changes as they relate to the size of the beaver dam head and impounded upstream area. All beaver ponds studied were in mountainous conditions in elevations between 9,000 and 10,000 feet. The average air and water temperatures as well as other physical stream conditions are vastly different from what are found in the Lakewood Southeast Project Area. The use of the study to draw conclusions on the impact of beaver to project area trout streams would be too dissimilar to support comparison. In addition, beaver activity can affect |
| 33 | 2    | of Class I and II native cold water trout streams. FS is  |   |
| 34 | 2    | using logging to control beaver activity. Recent New  |   |
| 36 | 2    | York Times op-ed describes logging to control beaver  |   |
| 39 | 3    | activity is flawed.   |   |
| 42 | 4    |   |   |
| 43 | 2    | “This is crucial for trout. Please note paragraphs 4-7  |   |
| 44 | 2    | of the following NY Times 9-28-2012 Op-Ed.by  |   |
| 45 | 1    | Mary Ellen Hannibal: "Stands of aspen and other   |   |
| 46 | 2    | native vegetation, once decimated by overgrazing, are   |   |
| 48 | 2    | now growing up along the banks. This may have   |   |
| 51 | 2    | something to do with changing fire patterns, but it is  |   |
| 52 | 3    | also probably because elk and other browsing animals  |   |
| 56 | 2    | behave differently when wolves are around. Instead  |   |
| 57 | 2    | of eating greenery down to the soil, they take a bite or  |   |
| 62 | 2    | two, look up to check for threats, and keep moving.   |   |
| 64 | 2, 3 | The greenery can grow tall enough to reproduce.”  |   |
| 65 | 2    |   |   |
| 66 | 2    |   |   |
| 68 | 4    |   |   |
| 69 | 3    |   |   |
| 34 | 3, 5 | <i>Scientists call this sequence of impacts down the food chain a “trophic cascade”. The wolf is connected to the elk is connected to the aspen is connected to the beaver. Keeping these connections going ensures healthy, functioning ecosystems, which in turn support human life.”</i>   |   |
| 51 | 3    | “All of the species are interconnected, and logging is not the solution: saving the wolves definitely is; more predators, less beavers.”  |   |
| 60 | 2    | <i>“There are cold-water trout streams which would be potentially ruined by logging on shores. Beaver will not harm trout streams. Human logging will.”</i>   |   |
| 27 | 21   | “While the Forest Service’s intention of preventing trout steam warming is commendable, its method and justification are flawed. First, peer-reviewed science does not support the conclusion that beaver activity is categorically harmful to cold-water fisheries. In fact, the leading science suggests that beaver activity can be beneficial to trout streams. Second, even if the Forest Service’s theory that beaver activity is harmful to cold-water fisheries is correct, logging within trout buffer zones would not prevent stream warming. For these reasons, the most certain way to prevent harmful impacts on the Class I and II trout streams is to not allow logging in the trout buffer zones. |   |

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|  | <p>There is simply no published, peer reviewed science that supports the conclusion that beaver activity is categorically harmful to Coldwater fisheries. Indeed, the best available science finds that beaver activity is often beneficial to Coldwater fisheries. For example, a 2011 study in the field's leading peer-reviewed journal, Freshwater Biology, showed that beaver dams can actually reduce the stream water temperature. It found that, depending on the size and shape of the impoundment upstream of the dam and the height of the dam itself, beaver activity can increase upwelling of cooler groundwater that decreases stream temperature downstream of the dam" [Fuller &amp; Peccary 2011]. "It also surveyed and cited numerous studies from many different locations and geographies that had similar findings. The Forest Service's report, on which it relies as justification for the trout stream logging strategy (DEIS at 112), also concludes that beaver are not categorically harmful to trout streams" [USFS 2002]. "After describing beaver impacts that various studies have found, the report states that "[w]hether any of these effects actually occur depends on the specific characteristics of each stream, including the size, amount of groundwater inflow, channel materials, gradient, and floodplain width." (USFS 2002 at 10, emphasis added). This report's conclusion is consistent with the Fuller &amp; Peckarsky study and is directly relevant as it cites a study conducted in the Nicolet National Forest" [McGrae &amp; Edwards 1994]. "and a study of streams in Michigan forests" [White 1990], "which also find that beaver activity is not necessarily harmful to trout streams and can be beneficial.</p> <p>The Forest Service's strategy to log aspen in trout buffer zones, however, relies on the incorrect assumption that beaver activity is categorically harmful to trout streams. Since the Forest Service's strategy relies on this incorrect assumption, the strategy is inherently flawed.</p> <p>Rather than being categorically harmful to trout streams, beaver activity may or may not be harmful depending on the circumstances. Therefore, without knowing the actual extent of beaver impacts on the streams in the project area, it is entirely possible that logging in trout buffer zones would have no beneficial impact on trout streams. The possibility that logging along trout streams may not be beneficial should be weighed against the certain impacts that</p> | <p>more than just stream temperature, particularly in low gradient streams. The forest plan's goal of the "no aspen regeneration zone" is to manage vegetation within these zones for species other than aspen, preferably long-lived conifers and hardwoods. The treatments prescribed in all the alternatives are designed to meet this purpose while maintaining streamside shade and reducing potential for sediment. Within the 300/450 foot no aspen regeneration zone, the RMZ extends either 100 ft. or 35 ft. from ordinary high water mark landward where harvesting plans would leave at least 60 square feet of basal area per acre in trees 5" DBH and greater. The type of harvest treatments proposed that fall within the 300/450 foot trout buffer zones are designed to meet the standards of BMPs (for the area that falls within the RMZ) as well as the objective to reduce the amount of aspen as an available food source. Again, beaver can adversely affect trout habitat by blocking migration, reducing shade through flooding, increasing water temperature, causing sedimentation of spawning areas, and altering habitat, which causes increased competition from other fish species. Aspen is a preferred food of beaver. Beaver do most of their foraging within 300 feet of the edge of water, but would forage out to 600 feet. The construction of canals and flooding associated with beaver impoundments can</p> |
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|  | <p>would occur from logging in these habitats to determine if the strategy is likely to be beneficial overall. Instead, the Forest Service’s strategy simply assumes that trout stream benefits will automatically follow from its strategy because less beaver activity will automatically result in less harm to trout streams... Since this assumption is refuted in the best available science and the Forest Service’s own report, the Forest Service must explain how this strategy will actually benefit trout streams in the project area, and if it cannot determine that the strategy will be a net benefit to trout streams, then the Forest Service should remove the strategy from the project. Even if the Forest Service’s beaver theory is correct, it is not clear how the strategy of logging aspen along the trout streams will help maintain cold water temperatures in the short-and middle-term. In the short-term, if all aspen are removed, this would create the same problem– removing shade – that the Forest Service argues beavers might create. The Forest Plan guidelines seem to address this concern by requiring that any logging leave 80% canopy cover on trout stream banks... However, leaving sufficient canopy cover makes the middle-term solution unclear; if upwards of 80% of aspen are left after logging, wouldn’t this still be enough aspen to attract the beaver activity the logging is supposed to be discouraging? If aspen only make up 20% of a stand along trout streams, then even if beaver remove those aspen, wouldn’t the remaining 80% canopy cover be sufficient to shade the stream?</p> <p>If aspen logging would either reduce shade in the short-term or not be sufficient to prevent attracting beaver in the middle-term, it is not an appropriate solution because, in either case, the goal of increasing shade for coldwater fisheries would not be achieved. Additionally, if aspen make up a small enough portion that 80% canopy cover is left after logging the aspen, then presumably beaver removing those aspen would have the same shade effects as logging the aspen. The FEIS must explain how logging aspen could be effective given these apparent design flaws. It must also explain why even an effective logging strategy is preferable to avoiding the harmful effects of sedimentation and other logging impacts in these vulnerable habitats.</p> <p>A better solution to benefit trout streams is not logging in the trout buffer zones and allowing the aspen to succeed to longer-lived species naturally. This solution is not contrary to the best available science and does not have implementation problems.</p> | <p>improve access and shorten the foraging distance to aspen (USFS 2002). If the harvest treatment does not meet these objectives then the vegetative treatment would not occur until outside the 300/450 foot zone.</p> <p>Appendix F of the Aquatic Resources Report for the Lakewood Southeast project describes in detail the monitoring that has occurred that has shown that BMPs are adequate, they have been correctly applied, and they are effective when implemented.</p> <p>Appendix D (forest plan standards and guidelines) plus additional design features that were determined to be needed for the projects being considered in this analysis. Both forest plan standards and guidelines, and design measures are an integral part of each of the action alternatives. They are meant to meet or exceed BMPs for water quality.</p> <p>The intent of forest plan standard (p. 2-16) for fisheries habitat management is to maintain a minimum 80% shrub or tree shade (where present) around ground water seeps within cool and cold water streams. DEIS at p. 45 left out the words “ground water seeps”, which is the intent for this standard.</p> <p>Potential for soil movement and/or sediment is discussed in the FEIS soils and aquatics sections. Impacts to these resources are first addressed by the projects themselves.</p> |
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|  |  | <p>While the Forest Service theorizes that beaver activity can negatively affect trout streams, it is well known that logging in trout buffer zones has harmful impacts on streams. Logging near streams can cause “sedimentation issues by road building/usage, any stream crossings, heavy equipment use and any possible associated rutting or soil disturbance”. (<i>See e.g., Park Falls Hardwoods DEIS MIS 5 Report at 9.</i>) “The sedimentation, in turn, is very harmful to fisheries, as described above. It is not prudent for the Forest Service to allow logging in trout buffer zones based on an unsupported theory that may not reduce impacts on trout streams when the logging itself is much more likely to have negative impacts. Therefore, the Forest Service should amend the project to not allow logging in the trout buffer zones. If not, because the science shows that beaver are not categorically harmful to trout streams, the Forest Service must demonstrate that trout streams in the project area is actually negatively impacted by beaver activity and that those impacts outweigh the harmful impacts that are certain to result from logging in these vulnerable habitats.”</p> | <p>See FEIS, Section 3.9.2 for a list of road activities located within and/or cross streams. Up to 1 mile of roads that cross through wetlands would be decommissioned. One road proposed for new construction located near RMZs would provide an opportunity to decommission a route where ATVs use is located along a lake and another would only utilize a temporary bridge. These proposed activities help to preserve hydrologic function as well as overall integrity of aquatic ecosystems. All construction activities would implement and maintain Wisconsin’s Forestry Best Management Practices for Water Quality (BMPs). Potential impacts to water quality from proposed activities are addressed in the FEIS, Section 3.9.2.</p> <p>Thank you for your comment on wolfs.</p> |
| 32<br>33<br>36<br>39<br>42<br>43<br>45<br>46<br>48<br>51<br>56<br>57<br>62<br>64<br>65<br>66<br>68<br>69 | 3<br>3<br>3<br>3<br>1, 5<br>3<br>1<br>3<br>3<br>4<br>3<br>3<br>3<br>4<br>3<br>3<br>2<br>1, 4 | <p>Limit logging in or next to old growth habitat to ensure long-term viability of forest interior species, such as red-shouldered hawks, northern goshawk, and pine martins.</p>   | <p>In accordance with forest plan guidance, this has been incorporated into the design of all the action alternatives. The IDT reviewed the harvests adjacent to the MA 8s before the DEIS was written. Harvests were changed to complement MA8 direction.</p>  |

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| 34                               | 3, 4, 5                     | <p>So the beavers keep the rivers from drying up while, at the same time, healthy vegetation keeps the rivers from flooding, and all this biological interaction helps maintain rich soil that better sequesters carbon — that stuff we want to get out of the atmosphere and back into the ground. In other words, by helping to maintain a healthy ecosystem, wolves are connected to climate change: without them, these landscapes would be more vulnerable to the effects of those big weather events we will increasingly experience as the planet warms. Beavers, despite being on the wolf’s menu, also benefit when their predators are around. The healthy vegetation encouraged by the presence of wolves provides food and shelter to beavers. Beavers in turn go on to create dams that help keep rivers clean and lessen the effects of drought. Beaver activity also spreads a welcome mat for thronging biodiversity. Bugs, amphibians, fish, birds, and small mammals find the water around dams to be an ideal habitat.</p> | <p>See the FEIS, Section 3.10.4 for discussion of carbon and climate change. The continued regeneration of early succession species like aspen within the riparian area has resulted in providing ample supplies of the preferred food source for beaver. Beaver can adversely affect trout habitat by blocking migration, reducing shade through flooding, increasing water temperature, causing sedimentation of spawning areas and altering habitat, which causes increased competition from other fish species (USFS 2002). The Forest has over 1,200 miles of stream designated as trout water. Significant efforts have been made over the last two decades to restore the coldwater community, particularly to maintain free-flowing conditions. Part of this effort has been to reduce the amount of aspen next to trout streams to discourage beaver activity within those streams.</p> |
| 34<br>42<br>53<br>40<br>54<br>59 | 6a<br>2<br>1<br>1<br>1<br>2 | <p>Alt 2 could impact Wisconsin’s tourism industry.</p> <p><i>Balance timber and tourism.</i></p>   | <p>See Appendix E, subpart A above, response #22-6.</p>  |
| 34<br><br>48<br>52               | 6b<br><br>4<br>2            | <p>“The USFS’ preferred alternative for this project includes logging, road-building, mechanical treatments, and maintenance activities that could have negative, cumulative impacts on water resources, fragile plant and animal communities, and species of concern.”</p> <p><i>Effects on water resources, fragile plants, and animals.</i></p> <p>Assure no damage to water.</p>  | <p>See FEIS Chapter 3, Sections 3.4, 3.6, and 3.9. Also see the BE posted on our website.</p>  |

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| 35                                     | 2                               | “Additionally, a large tornado went through here just a few years ago, blowing down a wide swath of timber. I believe that event alone means we will be well stocked with early-succession forest type for decades to come in N.E. WI.”      | At first glance, it may appear so- until we look at scale and context. About 5,500 acres of young forest was regenerated on the CNNF because of the tornado. However, there are about 296,000 acres of upland forests on this district alone. Therefore, the tornado increased the amount of early successional forest by less than two percent. In order to meet the goals and objectives of our forest plan, we need to maintain a certain level of young forest in various locations <i>throughout</i> the district. This created our proposals in this project. |
| 39                                     | 1                               | Long-term health of the ecosystem should be an overriding concern-not short-term economic gain.  | We agree. This is why we are trying to implement our forest plan in this location.  |
| 42                                     | 1, 2                            | CNNF provides critical habitat for species, especially northern goshawk, red-shouldered hawk, and American marten. Project would have negative, cumulative on water resources, fragile plant and animal communities, and species of concern. | We agree that the CNNF provides critical habitat for many wildlife species. All TES and RFSS that have habitat and potential for occurrence in the project area were analyzed for this project in the BE. Direct, indirect, and cumulative effects were discussed for those species with habitat, potential for occurrence, and potential impact by proposed projects were analyzed within the BE and MIS/MIH. See FEIS, Section 3.9.3 for water resource impacts.  |
| 47                                     | 1                               | Keep the forest priceless.   | Thank you for your comment.   |
| 51                                     | 5                               | “We cannot afford to lose these precious recyclers if we hope to stave off global warming.”  | See the FEIS, Section 3.10.4.   |
| 52                                     | 2                               | Minimize damage to forest and water.   | Comment noted. See FEIS.  |
| 53<br>48<br>50<br>51<br>53<br>54<br>62 | 1<br>4<br>1<br>6<br>1<br>1<br>4 | Commenter is against logging the area. They are concerned about impacts on resources.  | Thank you for your comment. We understand and respect your concern. However, please understand that part of our mission is to manage this landscape using commercial timber harvest. We make  |

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| 64<br>68 | 5<br>1 |   | great efforts to do it in a way that meets our objectives while trying to be responsive to public concerns and having the least impact possible. |
| 70       | 1      | “Please consider the method that is least impact on this rich region. Roads and logging in is I[sic] mistake. Occasionally we have those 100 and 500 year rains that wash away man made construction. It's all downhill to the lake!” | See FEIS, Section 3.3.2 for forest plan guidelines on road management. Also in the FEIS, Section 3.9.2 addresses major floods.                   |

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